

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LOURDES JIMENEZ CLAUDIO

DEBTOR

CASE NO 14-01519 MCF

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S MOTION TO DISMISS DOCKET NO. 104
AND REQUEST FOR EXTENSION OF TIME TO CURE PLAN ARREARS**

TO THE HONORABLE COURT:

COMES NOW, **LOURDES JIMENEZ CLAUDIO**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On June 12, 2019, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 104, basically stating that the Debtor is in arrears in the Plan payments in the sum of \$835.00 and that the Debtor has failed to provide the Trustee with a copy of the Debtor's 2017 and 2018 tax returns.

2. That on this same date the Debtor met with her undersigned attorney and hereby respectfully informs the Court that she admits incurring in the Plan arrears as stated by the Chapter 13 Trustee in his motion for dismissal. The reason for the arrears is that the Debtor was attending to certain personal/family matters which caused the Debtor to incur in certain extraordinary medical expenses, which situation did not allow the Debtor to maintain current the Plan payments to the Trustee.

3. That on this same date, July 12, 2019, the Debtor sent to the Chapter 13 Trustee (uploaded to the Trustee's system) a copy of the Debtor's 2017 and 2018 tax returns. The

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Debtor's 2017 and 2018 tax returns reflect that the Debtor **did not receive** a tax refund for the years 2017 and 2018.

4. That the Debtor needs additional time within to cure the arrears, thus, the Debtor respectfully requests thirty (30) days within to cure the arrears in the confirmed Plan payments, and upon curing the Plan arrears, inform the Court, accordingly. **This extension time to expire on August 12, 2019.**

WHEREFORE, the Debtor, through her undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq., Esq.; I also certify that a copy of this motion was sent via US Mail to the Debtor, Lourdes Jimenez Claudio, Villa del Carmen O 7 Calle 14 Gurabo PR 00778.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 12th day of July, 2019.

/s/ Roberto Figueroa Carrasquillo
USDC #203614
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